

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

HANS MOKE NIEMANN,	)	
	)	
Plaintiff,	)	Case No.: 4:22-cv-01110-AGF
	)	
v.	)	
	)	
SVEN MAGNUS ØEN CARLSEN A/K/A	)	
MAGNUS CARLSEN, et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS’ JOINT MOTION TO STAY  
RULE 16 CONFERENCE AND DISCOVERY**

Defendants Magnus Carlsen, Christopher Hikaru Nakamura, Daniel “Danny” Rensch, Chess.com, and Play Magnus AS d/b/a Play Magnus Group (collectively, “Defendants”), jointly request that the Court enter an order staying the Rule 16 conference and any merit discovery until after the Court rules on the pending motions to dismiss. It would preserve judicial and party resources if a case schedule were delayed until the pending jurisdiction and other issues are determined. Further, a stay of discovery is appropriate as Defendants are likely to succeed on their motions to dismiss, Defendants would face undue hardship if a stay is not granted, Plaintiff will suffer no prejudice by a stay, and a stay would preserve judicial and party resources.

For all these reasons and the reasons contained in Defendants’ accompanying Memorandum in Support filed herewith and incorporated herein, Defendants respectfully request that their Joint Motion to Stay Rule 16 Conference and Discovery be granted.

May 9, 2023

Respectfully submitted,

**STINSON LLP**

By: /s/ J. Nicci Warr

J. Nicci Warr (State Bar No. 59975)  
Jacob R. Schlueter (State Bar No. 73929)  
7700 Forsyth Blvd., Suite 1100  
St. Louis, Missouri 63105  
Office: 314.259.4570  
Email: nicci.warr@stinson.com  
Email: jacob.schlueter@stinson.com

**AXINN, VELTROP & HARKRIDER LLP**

By: /s/ Craig M. Reiser

Craig M. Reiser, admitted *pro hac vice*  
Denise L. Plunkett, admitted *pro hac vice*  
Eva H. Yung, admitted *pro hac vice*  
114 West 47th Street  
New York, New York 10036  
Office: 212.728.2200  
Fax: 212.728.2201  
Email: creiser@axinn.com  
dplunkett@axinn.com  
eyung@axinn.com

Caroline P. Boisvert, admitted *pro hac vice*  
90 State House Square  
Hartford, Connecticut 06103  
Office: 860.275.8100  
Fax: 860.275.8101  
Email: cboisvert@axinn.com

*Counsel for Defendant Magnus Carlsen*

/s/ Nima H. Mohebbi (w/ consent)

Nima H. Mohebbi (# 275453CA)

Sarah F. Mitchell (# 308467CA)

Michael A. Hale (# 319056CA)

**LATHAM & WATKINS LLP**

355 S. Grand Ave., Suite 100

Los Angeles, CA 90071

Tel: (213) 485-1234

*nima.mohebbi@lw.com*

*sarah.mitchell@lw.com*

*michael.hale@lw.com*

/s/ Jamie L. Wine (w/ consent)

Jamie L. Wine (# 4529251NY)

Blake E. Stafford (# 888324775DC)

**LATHAM & WATKINS LLP**

1271 Avenue of the Americas

New York, NY 10020

Tel: (212) 906-1200

*jamie.wine@lw.com*

*blake.stafford@lw.com*

/s/ Jeffrey B. Jensen (w/ consent)

Jeffrey B. Jensen (# 46745MO)

Kate Ledden (# 66026MO)

**HUSCH BLACKWELL LLP**

190 Carondelet Plaza, Suite 600

St. Louis, MO 63105

Tel: (314) 480 1500

*jeff.jensen@huschblackwell.com*

*kate.ledden@huschblackwell.com*

Derek Teeter (# 59031MO)

Spencer Tolson (# 74467MO)

**HUSCH BLACKWELL LLP**

4801 Main, Suite 1000

Kansas City, MO 64112

Tel: (816) 983-8000

*derek.teeter@huschblackwell.com*

*spencer.tolson@huschblackwell.com*

*Counsel for Defendants Chess.com, LLC,  
Daniel "Danny" Rensch, and Play Magnus  
AS*

**LEWIS RICE LLC**

By: /s/ Neal F. Perryman (w/consent)  
Neal F. Perryman, #43057 (MO)  
Michael L. Jente, #62980 (MO)  
Benjamin M. Farley, #69073 (MO)  
600 Washington Avenue, Suite 2500  
St. Louis, Missouri 63101  
Telephone: (314) 444-7661  
Facsimile: (314) 612-7661  
nperryman@lewisrice.com  
mjente@lewisrice.com  
bfarley@lewisrice.com

and

Michael J. Ryan, FL State Bar #975990\*  
\*Admitted PHV  
Michael J. Ryan, P.A.  
110 SE Sixth Street, Suite 2150  
Fort Lauderdale, Florida 33301  
Telephone: (954) 881-6995  
MJRyan@MJRyanLegal.com

*Attorneys for Defendant*  
*Christopher Hikaru Nakamura*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2023, the foregoing was filed electronically using the CM/ECF system which will automatically provide notice to all attorneys of record by electronic means.

/s/J. Nicci Warr